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5
6 United States District Court
7 Eastern District of Washington
(Honorable Judge Thomas O. Rice)

8 United States of America,
9 Plaintiff,
10 v.
11 Vincent Nicholas Petrushkin,
12 Defendant.
13

No. 2:21-CR-00164-TOR-2

Defendant's Supplement to the Sentencing
Memorandum and Updated Sentencing
Recommendation

14 Vincent Nicholas Petrushkin, through counsel, Zachary L. Ayers of Ayers Law
15 Firm, P.L.L.C., submits the following Supplement to the Sentencing memorandum
16 with updated sentencing recommendations. The original sentencing memorandum
17 (ECF 68) is hereby incorporated by this reference.
18

19 Mr. Petrushkin updates his sentencing recommendation and requests the Court
20 to sentence him to time served, a three-year term of supervised release, no fine, and a
21 \$100 special penalty assessment.
22

23 Should the Court order Mr. Petrushkin to reside in a Residential Re-entry
24 Center (RRC), Counsel alternatively asks the Court to sentence him to ten or twenty
25 days more than time served. This would effectively allow United States Probation to
26 request a bed date for Mr. Petrushkin in the RRC and make his transition back to
27

1 society significantly smoother than releasing him directly to the streets.

2 DATED this 15th day of March 2023.

3
4 Respectfully Submitted,

5 s/ Zachary L. Ayers

6 Zachary L. Ayers, WSBA#46496

7 Attorney for Mr. Petrushkin.

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Service Certificate

14 I hereby certify that on March 15, 2023, I electronically filed the foregoing with
15 the Clerk of the Court using the CM/ECF System which will send notification of such
16 filing to the following: Caitlin Baunsgard, Assistant United States Attorney.

20 s/ Zachary L. Ayers

21 Zachary L. Ayers, WSBA#46496

22 Attorney for Mr. Petrushkin.

23 Ayers Law Firm, P.L.L.C.

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